

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

FEE APPLICATION COVER SHEET FOR THE PERIOD
AUGUST 12, 2023 THROUGH DECEMBER 20, 2023

Debtor: LTJ Management LLC Applicant: Brown Rudnick LLP
Case No.: 23-12585 (MBK) Client: Official Comm of Tale Claimants
Chapter: 11 Case Filed: April 4, 2023

SECTION 1
FEE SUMMARY

☒ Post-Dismissal Monthly Fee Statement No. 1 or ☐ Final Fee Application

Summary of Amounts Requested for the Period from August 12, 2023 through December 20, 2023
(the "First Post-Dismissal Statement")

Total Fees: \$631,222.00¹
Total Disbursements: \$92,147.75
Minus 20% holdback of Fees (\$126,244.40): \$504,977.60
Total Amount Sought To Be Paid at this Time: \$597,125.35

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE ²	FEE
1. David J. Molton	Partner 1983	60.8	\$1,950	\$118,560.00
2. Jeffrey L. Jonas	Partner 1988	30.0	\$1,900	\$57,000.00
3. Michael S. Winograd	Partner 2001	182.5	\$1,280	\$233,600.00
4. Sunni P. Beville	Partner 2002	62.3	\$1,390	\$86,597.00
5. Cathrine M. Castaldi	Partner 1991	.1	\$1,390	\$139.00
6. Susan Sieger-Grimm	Counsel 1994	92.2	\$1,055	\$97,271.00

¹ Brown Rudnick excluded fees in the amount of \$100,685.00 in respect of transient timekeepers and other voluntary reductions.

² Brown Rudnick adjusts its standard billing rates firm wide on an annual basis. As described in more detail in the *Declaration of Sunni P. Beville Regarding Rate Increase* filed contemporaneously herewith, Brown Rudnick's standard rate increase will be in effect as of January 1, 2024 as follows: Partners, \$900 to \$2,250; Counsel and Other Non-Associate Attorneys, \$300 to \$2,575; Associates, \$695 to \$985; Paralegals, \$385 to \$545; and Other Professional Staff, \$120 to \$1,075.

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE ²	FEE
7. Gerard T. Cicero	Partner 2015	7.8	\$1,000	\$7,800.00
8. Michael W. Reining	Associate 2015	23.2	\$955	\$22,156.00
9. Alexander F. Kasnetz	Associate 2018	9.1	\$890	\$8,099.00
TOTALS		468.0		\$631,222.00

Fee Totals: \$631,222.00

Disbursements Totals: \$92,147.75

Total Fee Application \$723,369.75

**SECTION II
SUMMARY OF SERVICES**

SERVICES RENDERED	HOURS	FEE
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.	0.0	\$0.00
b) Asset Disposition Sales, leases, abandonment and related transaction work.	0.0	\$0.00
c) Avoidance Action Litigation Preference and fraudulent transfer litigation.	0.0	\$0.00
d) Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0.0	\$0.00
e) Case Administration Coordination and compliance activities, including review of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	0.0	\$0.00
f) Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	0.0	\$0.00
g) Employee Benefits/Pensions Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0.0	\$0.00
h) Fee/Employment Applications Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	53.0	\$73,481.00
i) Fee/Employment Objections Review of an objections to the employment and fee applications of others	0.0	\$0.00
j) Financing Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	0.0	\$0.00
k) Litigation General litigation and other contested matters.	285.8	\$394,083.50
l) Meetings of Creditors Preparing for and attending the conference of creditors, the 341 meeting and creditors' committee meetings.	125.7	\$157,290.00
m) Plan and Disclosure Statement Formulation, analysis, presentation, and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	0.0	\$0.00

SERVICES RENDERED	HOURS	FEE
n) Relief from Stay Proceedings / Injunction Litigation in Adversary Proceeding Matters relating to termination or continuation of automatic stay under sections 362 and 105; matters relating to preliminary injunction and related appeals.	.1	\$95.50
o) Accounting/Auditing Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0.0	\$0.00
p) Business Analysis Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0.0	\$0.00
q) Corporate Finance Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0.0	\$0.00
r) Data Analysis Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0.0	\$0.00
s) Litigation Consulting Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0.0	\$0.00
t) Reconstruction Accounting Reconstructing books and records from past transactions and bringing accounting current.	0.0	\$0.00
u) Tax Issues Analysis of tax issues and preparation of state and federal tax returns.	0.0	\$0.00
v) Valuation Appraise or review appraisals of assets.	0.0	\$0.00
w) Travel Time (billed @ 50%)	0.0	\$0.00
x) Committee Governance Matters Analysis regarding committee governance matters, including creation of by laws and addressing other governance matters.	0.0	\$0.00
y) Investigation and Due Diligence Investigation and analysis of prepetition transactions and activities of the Debtor and related entities and assessment of potential claims and causes of action.	0.0	\$0.00
z) Hearings Preparation for and attendance at hearings.	0.0	\$0.00
aa) Mediation Preparation for and attendance at mediation.	0.0	\$0.00
bb) Dismissal / Trustee / Examiner Matters Issues relating to motions to dismiss, motions to appoint an examiner or trustee, and related appeals as applicable.	0.0	\$0.00

SERVICES RENDERED	HOURS	FEE
cc) Meetings of Co-Counsel Preparing for and attendance at meetings of co-counsel and other TCC professionals to develop case strategy, coordinate actions items and prepare in advance of full committee meetings.	3.4	\$6,272.00
SERVICE TOTALS:	468.0	\$631,222.00

**SECTION III
SUMMARY OF DISBURSEMENTS**

DISBURSEMENTS	AMOUNT
a) Filing Fees Payable to Clerk of Court.	\$0.00
b) Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated. Westlaw and LEXIS at vendor cost.	\$21,201.33
c) Pacer Fees Payable to the Pacer Service Center for search and/or print.	\$57.10
d) Fax Include per page fee charged.	\$0.00
e) Case Specific Telephone/Conference Call Charges Exclusive of overhead charges.	\$0.00
f) In-house Reproduction Services Exclusive of overhead charges.	\$645.00
g) Outside Reproduction Services Including scanning services.	\$0.00
h) Other Research Title searches, UCC searches, Asset searches, Accurint.	\$0.00
i) Court Reporting Deposition Services / Transcripts	\$0.00
j) Travel Mileage, tolls, airfare, parking.	\$1,130.18
k) Courier & Express Carriers Overnight and personal delivery.	\$30.00
l) Postage	\$0.00
m) Other (specify) Meals Meals.	\$143.02
p) Other (specify) Expert Fees.	\$1,022.50
q) Other (specify) Professional Services.	\$67,366.12
r) Other (specify) eDiscovery Hosting.	\$300.00
s) Other (specify) Third Party Hosting.	\$252.50
DISBURSEMENTS TOTAL:	\$92,147.75

I certify under penalty of perjury that the above is true.

Date: December 21, 2023

/s/ Sunni P. Beville

BROWN RUDNICK LLP (“Brown Rudnick”) submits this First Post-Dismissal Monthly Fee Statement of Brown Rudnick LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Co-Counsel for The Official Committee of Talc Claimants for the Period from August 12, 2023 through December 20, 2023 (“First Post-Dismissal Monthly Fee Statement”), pursuant to the Order Establishing Procedures for the Allowance of Interim Compensation and Reimbursement of Expenses of Retained Professionals entered on May 22, 2023 [Docket No. 562] (the “Interim Compensation Order”).

WHEREFORE, Brown Rudnick respectfully requests payment of fees for the First Post-Dismissal Monthly Fee Statement in the sum of \$504,977.60, together with expenses of \$92,147.75, for a total requested payment of \$597,125.35, in accordance with the terms of the Interim Compensation Order.

Dated: December 21, 2023

BROWN RUDNICK LLP
*Co-Counsel to the Official Committee
of Talc Claimants*

By: /s/ Sunni P. Beville
SUNNI P. BEVILLE